## February 24, 2010

Via ECFS

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW, Suite TW-A325 Washington, DC 20554

Re:

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification; EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 24, 2010

Name of company covered by this certification:

Free Conferencing Corporation Form 499 Filer ID: 827274

Name of signatory: David Erickson

Title of signatory: President

I, David Erickson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules located at 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. Free Conferencing Corporation provides conferencing services.

Free Conferencing Corporation has not taken any actions (i.e., proceedings instituted or petitions filed by Free Conferencing Corporation at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

Free Conferencing Corporation has not received customer complaints in the past year concerning the unauthorized release of CPNI.

Free Conferencing Corporation represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

## **Free Conferencing Corporation**

## **Statement of CPNI Operating Procedures**

Free Conferencing Corporation has established policies and procedures to comply with the Federal Communications Commission's (FCC) rules regarding the use, disclosure, and access to customer proprietary network information (CPNI) as set forth in section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that Free Conferencing Corporation is compliant with the FCC's CPNI rules. The purpose of this statement is to summarize Free Conferencing Corporation's policies and procedures designed to safeguard CPNI.

Free Conferencing Corporation uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. Free Conferencing Corporation does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Free Conferencing Corporation does not use CPNI for marketing purposes. If, at such time, it later decides to use CPNI for marketing purposes, then it will provide appropriate customer notification, maintain a record of such campaigns, and take any and all actions as required under the FCC's rules.

Free Conferencing Corporation has established procedures to verify an incoming caller's identity. Free Conferencing Corporation trains its personnel in both the use of CPNI, and protection of its confidential information. Free Conferencing Corporation has an express disciplinary process in place for violations of its procedures, which include the potential for termination. Free Conferencing Corporation does not release Call Detail Information during an in-bound call.

Free Conferencing Corporation has implemented safeguards to protect customer information. For example, Free Conferencing Corporation also limits the number of employees that have access to customer information and call data.

Free Conferencing Corporation has implemented measures to discover and to protect against unauthorized attempts to access CPNI. Free Conferencing Corporation also has implemented procedures pursuant to which it can track breaches of CPNI, and given such an event will notify the United States Secret Service and the Federal Bureau of Investigation in accordance with the FCC's rules. Free Conferencing Corporation also will notify customers of any such breach in accordance with the FCC's rules. Free Conferencing Corporation will maintain a record of such notifications as specified in the FCC's rules.

Free Conferencing Corporation will track customer complaints regarding CPNI, notify its customers in accordance with the FCC's rules.

Free Conferencing Corporation will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.